

Privacy Policy

This policy describes how we collect, use, transfer and disclose information relating to you that we obtained through the Miniila App.

Missing Children Europe with registered office at Rue de l'Industrie 10, 1000 Brussels, Belgium, as the entity behind the Miniila App, processes Personal Data as a Controller as defined in the EU General Data Protection Regulation (EU 2016/679, hereafter GDPR). GDPR applies in any case where the use of apps on smart devices involves processing personal data of individuals.

We will not use your personal information for purposes not mentioned in this privacy policy without first notifying you and, where required, asking for consent if we may process your personal information for this purpose.

This privacy policy may be updated from time to time, and we recommend that you consult it on a regular basis.

Definition of Personal Data

For purposes of this policy, personal data is any data or combination of data in any form or medium, relating directly to an identified or identifiable natural person; this includes for example, age, contact information, pictures, or IP address.

Data Collected

To ensure the correct operation of the Miniila platform, the Miniila App will collect data regarding your:

- Location (geolocation is only used when the app is on for the directory and the detail pages of organizations or services. It is used to calculate distance between user and location)
- Age / Date of Birth
- IP address (the IP address is stored only for people managing the CMS for security purposes)

We obtain personal information from you via:

- direct interactions: when you engage with the Miniila App, you are required to disclose the personal information as mentioned in this privacy policy below.
- cookies and other automated technologies: when you interact with the App or our website(s), we may use cookies and similar technologies to track activities. We also track usage of mobile apps through analytics.

To register with the app, users are required to provide their age and allow for geolocalisation.

We only collect and use your personal information on the basis of consent, legal obligations, or when it is necessary to achieve our legitimate interests of providing access to child friendly, up to date and accessible information on rights, procedures and the available support. The Miniila app uses personal data, as described above, for the purpose of operating the platform and providing the information and services required in connection with the app. The app further uses information about the user's device for the purpose of improving the platform and services, such as displaying content in the most effective manner for the user and their device. The collected data does not allow us to identify the user.

The app is targeted at users above the age of 13*. Minors below the age of 13 may use this Application only with the assistance of a parent, a guardian, or an adult with parental responsibility over the child.

Mode and Place of Data Processing

Your access to and use of the app is conditioned on you providing data mentioned above, which means you consent to the use of this personal data by Missing Children for the purposes mentioned above.

Methods of processing: we maintain appropriate technical, physical and organisational measures to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access. Technical measures include a safeguard that the app can only access the data for which API calls are made. Organisational measures include providing access to only a restricted number of staff, all with valid background checks.

Place: Data is stored with the developers at IntoApps, the server itself is at a transip hosted in Amsterdam, The Netherlands.

Retention time: Personal Data will be processed and stored for as long as you are using the app. Data is not automatically deleted with the deletion of the app, but manually. We will only retain personal data for as long as we are required to do so by applicable law(s), or for as long as necessary for the purpose(s) for which it is processed, in no case longer than 1 year, after which it will be deleted. We may keep some anonymised data for statistical reasons, managed through Google Analytics, in no case longer than 2 years. This includes the total number of users of the app, the number of users of the app per country, the language preferences and the median age. If we do, we will ensure that your privacy continues to be protected.

As recommended by GDPR, we perform pseudonymisation and anonymisation on your personal data. This entails storing your data in an unreadable manner, only readable by technical personnel from our app developer, to ensure that all data is secure. Data can only be obtained through whitelisting and SSH.

Transfer of Your Data to Third Parties

Missing Children Europe will never pass on your personal data to third parties, with the exception of service providers who handle support in so far as this is necessary for the technical provision of services and/or if they are obliged to do so on the basis of the statutory provision or a judicial ruling. Data will only be shared with a third party that is based in a country where GDPR applies. Personal data is not available to NGOs and charities that have partnered with the Platform.

We may only share aggregated statistical information (such as number of downloads, the number of users in each country, the number of users for each language) with the developers of the app, Missing Children Europe members, other organisations, donors and the general public. This information does not allow to relate to any identified or identifiable individual.

Transfer of Your Data to authorities: Unless required by law, we do not share your data or any other information on you with authorities, such as policy or migration authorities.

Your rights concerning your data

Any requests to exercise your rights concerning your data can be directed free of charge to us through the contact details provided in this document. These requests will be addressed by us in a timely manner, always within one month.

You have the right to:

- At any time, withdraw your consent to the processing of your personal data, by deleting the app.

- At any time, request and retrieve information regarding how your data is used and/or processed.
- At any time request your data to be rectified and erased.

If you wish to exercise any of these rights, please email info@missingchildreneurope.eu. Parents and adults with parental care have the right to request, at any time, that the information collected about the child in their care is removed from our database.

Cookie details

Please see our General Privacy Policy available here for cookies and data breaches:
<http://missingchildreneurope.eu/Portals/0/MissingChildrenEuropePrivacyPolicy.pdf>